

BIO-6b: Chevron shall demonstrate to the satisfaction of the California State Lands Commission (CSLC) that the Long Wharf can successfully implement its Oil Spill Response Plan and can deploy within 3 hours all the boom necessary to simultaneously protect all the sensitive resources at risk of contact with oil within 3 hours from a spill at the Long Wharf. Sensitive resources close to the Long Wharf include Castro Rocks, eelgrass beds, and the double-crested cormorant breeding colony on the Richmond-San Rafael Bridge. Procedures for the protection of Castro Rocks and eelgrass beds are detailed in the Area Contingency Plan (USCG and OSPR 1997). Chevron shall obtain the 15,000 feet (2.8 miles) of boom necessary to protect the Richmond eelgrass beds and Castro Rocks simultaneously from a spill at the Long Wharf. Chevron shall survey for eelgrass annually in the Richmond area and identify the places where substantial amounts of eelgrass currently grow. Chevron shall implement drills specifically designed to deploy and anchor booms simultaneously to protect immediately Castro Rocks and the Richmond eelgrass beds from oil. Because a spill could reach these areas rapidly, Chevron should have immediate access to the equipment and personnel detailed in the Area Contingency Plan.

We believe that Chevron's contract with MSRC provides adequate mitigation for this impact.

MSRC has received an OSRO rating for shoreline protection from the California OSPR. With this rating MSRC customers can cite MSRC in their Oil Spill Contingency Plans to meet their shoreline protection requirements as outlined in California regulations. MSRC obtained its shoreline protection rating by demonstrating through unannounced drills conducted by OSPR that we are capable, under the planning parameters set by the State, of deploying sufficient resources to protect sensitive sites that may be impacted during the first six hours of a response.

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Through their contract with MSRC, Chevron has immediate access to all of MSRC's resources. In California MSRC maintains an inventory of over 200,000 feet of boom. In Richmond alone MSRC stores over 37,000 feet of boom. This boom is stored on response vessels and in trailers that are staged near launch points that make it strategically available for deployment. Storing 15,000 feet of boom at the Long Wharf may present logistic issues that could delay deployment.

Through the Coast Guard/OSPR San Francisco Bay Area Committee MSRC participates in the sensitive site evaluation program. As part of the program OSRO's have agreed to conduct field deployment exercises to confirm the validity of sensitive site protection strategies in the Area Contingency Plan. This is an on-going program in which MSRC conducts a minimum of four deployment drills per year to deploy boom and anchors at selected sensitive sites. Prior to each exercise OSPR must complete a set protocol that includes a pre-drill site assessment and completion of a Section 7 Consultation with the U.S. Fish and Wildlife Service. OSRO's and plan holders are advised that sensitive site protection deployment exercises should not be conducted without having OSPR perform the set protocol.

BIO-6c: Procedures should be in place to flush double-crested cormorants from the waters contaminated by oil. Arrangements should be made to quickly bring expert bird rehabilitators to the site to rescue oiled birds.

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